# **ENCLOSURE**

# NRC Manual Chapter 0350 Restart Action Plan for LaSalle County Station

# LASALLE STATION MANUAL CHAPTER 0350 RESTART ACTION PLAN

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# A. GENERAL

## A.1 PURPOSE

To provide a basis to plan and coordinate NRC review activities for restart of LaSalle Station, Unit 1. While many of the activities in the licensee's Restart Plan apply to Unit 2, this Action Plan describes those actions that will be taken to address the restart of Unit 1.

# A.2 **OBJECTIVES**

To ensure that NRC review efforts are consistently developed, communicated, and implemented and specific guidance is provided to support:

- a. Determining restart issues for review,
- b. Identifying the basic tasks needed to review and approve plant restart, and
- c. Coordinating and tracking restart review activities.

# A.3 BACKGROUND

LaSalle Station was on the NRC's watch list from April 1986 until October 1986. Due to declining performance the NRC issued trending letters to LaSalle Station in January and June of 1994. In May 1996, a risk-significant service water event occurred involving the injection of large quantities of expandable foam sealant into the safety-related service water tunnel, rendering the essential service water system inoperable for both units. The NRC issued a Confirmatory Action Letter (CAL), No. RIII-96-008 and Supplement No. RIII-96-008A to address the issues at LaSalle involving the sealant injection event. The event provided the NRC with insights into LaSalle Station performance which indicated that significant performance weaknesses continued to exist in a number of areas. This event coupled with other design, hardware, and personnel performance issues, indicated that previous efforts to improve performance were not successful. On October 17, 1996, the NRC issued a SALP report for LaSalle with ratings of 3 in all areas except plant support which represents a decline from the previous evaluation period.

To address continuing performance deficiencies, Commonwealth Edison management contracted to have an Independent Safety Assessment (ISA) conducted at LaSalle Station in the fall of 1996. The ISA was conducted by a team of industry peers and Institute of Nuclear Power Operations representatives. The team's charter was to determine why previous improvement initiatives at LaSalle Station had not been successful and the ISA confirmed many of the performance deficiencies identified by the NRC. In September 1996, the NRC conducted a Safety System Operational Performance Inspection (SSOPI) of the service water system. The team identified a number of deficiencies in the areas of design basis understanding, maintenance practices, and testing.

In September 1996, both units were shutdown; Unit 1 to repair a turbine control valve and Unit 2 for a refueling outage. In December, a decision was made to further extend the outages for both units to address performance issues identified by the NRC, the licensee, and the ISA. The licensee developed a Restart Plan to implement improvements in operations, engineering, plant material condition, human performance, and the corrective action process. Included in the Restart Plan is the performance of system functional reviews. These reviews have been completed by the licensee and have revealed deficiencies which affected the ability of some systems operability to perform their function under certain circumstances.

Based on continuing performance problems, the NRC placed LaSalle Station on the NRC's watch list in January 1997. Following the Senior Management Meeting (SMM) and Commission briefing, the NRC decided to implement an oversight panel for LaSalle. On April 14, 1997, a Plant Performance Review Panel, consisting of regional and headquarters personnel, was established. In addition, a CAL Supplement, No. RIII-96-008B, was issued following the ISA to formalize the licensee's commitments to address deficiencies in material condition, human performance, corrective action process, and engineering support and design deficiencies prior to restart.

# A.4 ACTIVITIES

A comprehensive NRC review of the restart process is required. This Restart Action Plan is intended to include expected NRC actions that will be required to be taken before restart of LaSalle Station. The Plan defines: the actions which must be accomplished by the NRC, as a minimum, to approve restart; the organization that has the lead responsibility for each action; the case-specific issues which must be resolved before restart; and the individuals with the actual responsibility for restart approval. The Panel retains responsibility for assessment of the restart issues and determining whether each issue has been satisfactorily addressed. The Panel will make updates and minor revisions to the Restart Action Plan. Restart Panel meetings will be documented on minutes to include restart issues reviewed.

Section B, "Case-Specific Checklist - Part I," of this plan provides generic tasks that support the Restart Action Plan. This section outlines the overall review process needed for the NRC to authorize restart of the facility. Section C, "Case-Specific Checklist - Part II," contains issues requiring assessment during the restart review. Within the scope of each issue are numerous elements or examples supporting the broader issues which were the causes for the shutdown. It will not be necessary for each element or example on the checklist to be assessed, but enough items must be reviewed to make an assessment that the issue has been sufficiently resolved to support plant restart. Each of the checklists in Section B and C includes columns to record the NRC organization with lead responsibility for the item and the date and mechanism by which the item was or will be closed.

The Panel is responsible for implementation of the LaSalle Restart Action Plan. The Panel will maintain and periodically review the Restart Action Plan. These actions should: (1) determine review status, (2) verify necessary tasks and items are complete for each phase of the review, and (3) ensure that review tasks and issues for assessment remain consistent with the known facts and status of the restart effort. The lists in Sections B and C should be reviewed when significant milestones are completed and prior to restart authorization to ensure any emerging items are considered.

# A.5 OVERALL NRC VERIFICATION STRATEGY

The Panel is responsible for reviewing status and rationale for closure of all Case-Specific Checklist issues. Verifications performed by the Panel itself (such as review of the LaSalle Restart Plan) will be documented in the Case-Specific checklist and supplemented as needed in the Panel meeting minutes.

Several of the verification items in the Case-Specific Checklist will be completed in the routine inspection program by the resident and regional staff. In addition, the NRC will conduct inspections in the areas of engineering and technical support, self-assessment and corrective actions, operator licensing, and inservice testing of pumps and valves. These verifications will be

documented in the inspection reports.

A Restart Readiness Assessment Team inspection will be conducted by a Region III inspection team near or after the licensee has informed the NRC (in accordance with the CAL) that the plant is ready to restart. This inspection will be a modified Operational Readiness Assessment Team/Operational Safety Team Inspection and will evaluate areas delineated in the Case-Specific Checklist, as well as other performance concerns designated by the Panel. The inspection may encompass some performance areas not addressed in the LaSalle Restart Plan or NRC case-specific checklist, as determined by the Panel, to ensure that the current scope and significance of previously identified performance problems should not preclude safe plant startup and operation. The Restart Readiness Assessment Team will be organized and led by Region III Division of Reactor Safety personnel. These efforts will be documented in an inspection report.

# B. <u>CASE-SPECIFIC CHECKLIST - PART I (PROCESS)</u>

# B.1 INITIAL NRC RESPONSE

Establishment of the facts, the causes, and their apparent impacts should be accomplished early in the process. This information will assist the NRC in characterizing the problems, the safety significance, and the regulatory issues. Early management appraisal of the situation is also important to ensure the proper immediate actions are taken. Many of these items may already be complete when the initial checklist review is performed.

### **TASKS**

a. Initial notification and NRC management discussion of known facts and issues (Region).

STATUS: COMPLETE

LaSalle Performance Review Panel established and Charter issued 4/15/97.

c. Determine need for formal regulatory response (i.e. order or CAL).

STATUS: COMPLETE

Supplemental CAL RIII-96-008B issued 4/14/97. CAL requires licensee to docket its Restart Plan to address performance deficiencies; keep the NRC informed of proposed startup dates; and meet with the NRC monthly, after completing the licensee initiated High Intensity Training (HIT) of operators, and when ready to restart the first unit.

d. Identify other parties involved (i.e., NRC Organizations, other Federal agencies, industry organizations).

STATUS: COMPLETE

Illinois Department of Nuclear Safety involved.

## **B.2 NOTIFICATIONS**

Initial notification of the event quickly communicates NRC's understanding of the event and its immediate response to the parties having an interest in the event. Notification to Regional and headquarters offices of cognizant Federal agencies may be appropriate. As the review process continues, additional and continuing notifications may be required.

# **TASKS**

a. Issue Daily and Director's Highlight (NRR).

STATUS: COMPLETE

Director's Highlights issued 10/2/96 and 11/20/96.

b. Issue preliminary notification (Region).

STATUS: COMPLETE

Preliminary Notifications (PNs) PNO-111-063, PNO-RIII-96-063A, PNO-RIII-96-074 issued.

f. State and local officials notified (Region).

STATUS: COMPLETE

PNs PNO-111-063, PNO-RIII-063A, and PNO-RIII-96-074 issued. Press releases issued by public affairs.

g. Congressional notification (NRR)

STATUS: COMPLETE

The House Commerce Subcommittee on Oversight and Investigations was notified of plant status during briefings by NRR and Region III management on 8/25/97.

# B.3 ESTABLISH AND ORGANIZE THE NRC REVIEW PROCESS

It will be necessary to establish and organize the NRC restart review to ensure the effective coordination of resources in evaluating the restart process. Effective interfaces within and outside the NRC are critical to properly identify and resolve the pertinent issues. Consider both Regional and headquarters offices of cognizant Federal agencies.

# **TASKS**

Establish the Restart Panel.

STATUS: COMPLETE

A Restart Oversight Panel was established on 3/7/97 by a memo from J. Caldwell and G. Grant to Reactor Inspection Staff/Supervisors. The licensee was notified by letter dated 3/12/97 of the NRC oversight efforts regarding LaSalle Station.

The panel charter was issued on 4/15/97 by a memo from M. Leach to M. Dapas.

b. Assess available information (i.e. inspection results, licensee self-assessments, industry reviews).

STATUS: COMPLETE

Information reviewed:

SSOPI inspection report (96011) Independent Self Assessment Team report (2/18/97) Commonwealth Edison (ComEd) response to 50.54f letter (3/28/97)

c. Obtain input from involved parties both within NRC and other Federal agencies such as FEMA, EPA, DOJ.

STATUS: COMPLETE

Input received from EDO, NRR, and Region III.

d. Conduct Regional Administrator briefing (Region).

STATUS: COMPLETE

Briefing conducted December 1996.

e. Conduct NRR Executive Team briefing (NRR).

STATUS: COMPLETE

Briefing conducted during January 1997 Senior Management Meeting (SMM).

f. Develop the case-specific checklist (CSC).

STATUS: COMPLETE

Panel approval on 11/20/97.

g. Develop the Restart Action Plan.

STATUS: COMPLETE

Panel approval on 11/20/97.

h. Regional Administrator approves Restart Action Plan.

STATUS: COMPLETE

Plan issued 12/16/97.

j. Implement Restart Action Plan.

STATUS: COMPLETE

As documented in Plan status.

k. Supplement CAL necessary.

STATUS: COMPLETE

CAL RIII-96008 Supplement B issued.

# B.4 REVIEW IMPLEMENTATION

The review will be accomplished by a variety of methods including inspections, testing, evaluation of licensee self-assessments, evaluation of licensee action plans, and regulatory actions. Once the licensee has developed its corrective action plan, the NRC shall review that plan to verify its completeness and adequacy. The NRC will also determine which corrective actions will be required to be implemented before restart, and thus become restart issues, and those that can be deferred to some later date as long-term corrective actions. The discussions and issues provided in Section C of this appendix provide additional information to support the review activities described below.

### B.4.1 Root Causes and Corrective Actions

# **TASKS**

a. Evaluate findings of AIT, IIT, or special team inspection.

STATUS: COMPLETE

No AIT was performed for this shutdown. However, the AIT in July 1996 identified several problems that are part of the licensee's Restart Plan. In addition, the Panel has evaluated findings from the SSOPI and ISA.

b. Licensee performs root cause analysis and develops corrective action plan for root causes.

STATUS: COMPLETE

Licensee contracted a team for an Independent Self Assessment (ISA). The ISA team's report was issued to the NRC on 2/18/97.

Licensee's Restart Plan was submitted to the NRC on 5/22/97. Revision 1A of the

licensee's Restart Plan was submitted to the NRC on 8/27/97 and supplemented with more supporting details on 9/16/97.

c. NRC evaluates licensee's root cause determination and corrective action plan.

RESPONSIBILITY: Panel

STATUS: COMPLETE

Panel review of the licensee's Restart Plan completed 11/20/97.

# B.4.2 <u>Assessment of Equipment Damage</u>

This section is not applicable to the situation at LaSalle Station. No equipment damage existed as the result of an event at the plant.

# B.4.3 <u>Determine Restart Issues and Resolution</u>

### **TASKS**

a. Review/evaluate licensee generated restart issues.

RESPONSIBILITY: Panel

STATUS: COMPLETE

Licensee letter dated 12/30/96 provided restart issues. CAL No. RIII-96-008B issued after NRC review of the licensee's restart issues.

b. Independent NRC identification of restart issues (consider sources external to NRC and licensee).

STATUS: COMPLETE

As discussed in CAL No. RIII-96-008B, NRC identified that the plant material condition, human performance problems, corrective action process, and engineering support and design deficiencies are issues that must be addressed by the licensee prior to restarting the units.

c. NRC/licensee agreement on restart issues.

STATUS: COMPLETE

As indicated in its Restart Plan dated September 16, 1997, the licensee agrees that the deficiencies identified by the NRC in its CAL must be addressed prior to restart.

d. Evaluate licensee's restart issues implementation process.

STATUS: COMPLETE

Evaluation completed by the Panel on 11/20/97.

e. Evaluate licensee's implementation verification process.

STATUS: COMPLETE

Evaluation completed by the Panel on 11/20/97.

# B.4.4 Obtain Comments

### **TASKS**

a. Obtain public comments. (Panel)

NRC staff will be available to answer questions and receive comments from the public at all Restart Panel meetings.

STATUS: COMPLETE

Discussed during 7/7/98 panel meeting. Panel decided that this activity was being routinely accomplished and that this item could be closed after the Public Restart meeting.

b. Obtain comments from state and local officials (Region).

Illinois Department of Nuclear Safety (IDNS) Officials routinely interface with the NRC resident staff. In addition, IDNS officials attend the Restart Panel meetings open to the public and have the opportunity to interface with NRC management following the meetings.

STATUS: COMPLETE

During the 7/7/98 panel meeting, the Panel participants decided that this activity had been accomplished and therefore concurred on closure of this item.

# B.4.5 Closeout Actions

### **TASKS**

a. Evaluate licensee's restart readiness self-assessment. Assigned to the Restart Readiness Inspection due to change in licensee restart date compared to completion of licensee restart assessment.

STATUS: COMPLETE

Closed in Inspection Report 98015.

b. NRC evaluation of applicable items from Section C "ISSUES" complete. (Panel)

STATUS: COMPLETE

Status of MC 0350 issues and other known potential startup issues were discussed and verified as closed during the 7/16/98 and 7/23/98 Panel meetings. The MC 0350 and CAL closure letter also indicates that the licensee remains responsible for ensuring that any other issues which may impact unit restart or safe plant operation are promptly identified and properly addressed.

c. Restart issues closed.

STATUS: COMPLETE

Status of MC 0350 issues and other known potential startup issues were discussed and verified as closed during the 7/16/98 and 7/23/98 Panel meetings. The MC 0350 and CAL closure letter also indicates that the licensee remains responsible for ensuring that any other issues which may impact unit restart or safe plant operation are promptly identified and properly addressed.

Conduct NRC Restart Readiness Assessment Team inspection (Region).

STATUS: COMPLETE

Bag trip conducted during week of 6/11/98 with inspections completed the weeks of 7/6 and 7/13/98.

e. Issue augmented restart coverage inspection plan (Region).

STATUS: COMPLETE

Augmented restart coverage plan was developed and discussed during the 7/23/98 Panel meeting.

f. Comments from other parties considered.

NRC staff will remain available to answer questions and receive comments from the public and IDNS at all Restart Panel meetings. Target date for completion is following notification by the licensee of its readiness for restart and immediately following the NRC/licensee restart meeting.

STATUS: COMPLETE

Discussed during 7/7/98 panel meeting. Panel decided that this activity was being routinely accomplished and that this item could be closed after the Public Restart meeting.

g. Determine that all conditions of the Order/CAL are satisfied.

STATUS: COMPLETE

Confirmatory action letter items were discussed and verified closed during the

7/23/98 Panel meeting.

Re-review of Generic Restart Checklist complete.

STATUS: COMPLETE

Re-review accomplished 7/16/98 and final items to be completed targeted.

# B.5 RESTART AUTHORIZATION

When the restart review process has reached the point that the issues have been identified, corrected, and reviewed, a restart authorization process is begun.

# **TASKS**

a. Prepare restart authorization document and basis for restart.

STATUS: COMPLETE

Panel recommendation memo and letter to licensee for MC 0350 and CAL closeout have been drafted.

b. NRC Restart Panel recommends Restart Authorization (Panel).

STATUS: COMPLETE

This item is considered closed based upon discussion of current status, specific description of actions being taken to complete this item, and Panel agreement to those steps during the 7/23/98 Panel meeting. Final verification is being tracked outside the MC 0350 Plan.

c. No restart objections from applicable HQ offices (NRR).

STATUS: COMPLETE

The Office of Enforcement and Office of Congressional Affairs were verbally notified regarding LaSalle restart. No objections were given to plant restart. This item is considered closed based upon discussion of current status, specific description of actions taken to complete this item, and Panel agreement to those steps during the 7/23/98 Panel meeting.

d. No restart objections from applicable Federal agencies (NRR).

STATUS: COMPLETE

Regional Liason Officer verified with FEMA that FEMA did not have any restart concerns regarding LaSalle. This item is considered closed based upon discussion of current status, specific description of actions taken to complete this item, and Panel agreement to those steps during the 7/23/98 Panel meeting.

e. Regional Administrator concurs in Restart Authorization (Region).

STATUS: COMPLETE

This item is considered closed based upon discussion of current status, specific description of actions being taken to complete this item, and Panel agreement to those steps during the 7/23/98 Panel meeting. Final verification is being tracked outside the MC 0350 Plan.

k. Regional Administrator authorizes restart.

STATUS: COMPLETE

This item is considered closed based upon discussion of current status, specific description of actions being taken to complete this item, and Panel agreement to those steps during the 7/23/98 Panel meeting. Final verification is being tracked outside the MC 0350 Plan.

# B.6 RESTART AUTHORIZATION NOTIFICATION

Notify the applicable parties of the restart authorization.

### **TASKS**

a. Commission (if the Commission did not concur In the Restart Authorization or as requested) (NRR).

STATUS: COMPLETE

A letter has been drafted by the NRR project manager to be sent to the Commissioners from the Office of the EDO which informs them of restart approval. This item is considered closed based upon discussion of current status, specific description of actions being taken to complete this item, and Panel agreement to those steps during the 7/23/98 Panel meeting. Final verification is being tracked outside the MC 0350 Plan.

b. EDO (if the EDO did not concur in the Restart Authorization or as requested) (NRR).

STATUS: COMPLETE

A letter has been drafted by the NRR project manager to be sent to the Commissioners from the Office of the EDO which informs them of restart approval. This item is considered closed based upon discussion of current status, specific description of actions being taken to complete this item, and Panel agreement to those steps during the 7/23/98 Panel meeting. Final verification is being tracked outside the MC 0350 Plan.

c. Congressional Affairs (NRR).

STATUS: COMPLETE

The Office of Congressional Affairs was verbally notified of LaSalle restart plans before the public Restart meeting. After restart approval is given the corresponding PN will be provided to the Office of Congressional Affairs. This item is considered closed based upon discussion of current status, specific description of actions being taken to complete this item, and Panel agreement to those steps during the 7/23/98 Panel meeting. Final verification is being tracked outside the MC 0350 Plan.

d. ACRS (a briefing may be substituted for the written notification if the ACRS requests a briefing) (NRR).

STATUS: COMPLETE

The ACRS was verbally notified of LaSalle startup plans. The ACRS representative indicated that they did not need any special notification of restart approval. This item is considered closed based upon discussion of current status, specific description of actions taken to complete this item, and Panel agreement to those steps during the 7/23/98 Panel meeting.

f. Public Affairs (Region).

STATUS: COMPLETE

A PN and press release have been drafted that will be issued following final restart approval. This item is considered closed based upon discussion of current status, specific description of actions being taken to complete this item, and Panel agreement to those steps during the 7/23/98 Panel meeting. Final verification is being tracked outside the MC 0350 Plan.

g. State and local officials (Region).

STATUS: COMPLETE

Regional Liason Officer notified the Illinois Department of Nuclear Safety and the Illinois Commerce Commission regarding the LaSalle Restart public meeting. In addition, a press release was issued with regard to the meeting. A PN and press release have been drafted that will be issued following final restart approval. This item is considered closed based upon discussion of current status, specific description of actions being taken to complete this item, and Panel agreement to those steps during the 7/23/98 Panel meeting. Final verification is being tracked outside the MC 0350 Plan.

# C. CASE-SPECIFIC CHECKLIST - PART II (ISSUES)

# C.1 ASSESSMENT OF ROOT CAUSE IDENTIFICATION AND CORRECTION

The listing of applicable assessment criteria provides the basis for NRC assessment of the effectiveness of the licensee's corrective action plan.

# C.1.1 Event Analysis and Root Cause Assessment

a. Conditions leading up to and eventually requiring the shutdown, including performance and process concerns related to the shutdown, are understood.

STATUS: COMPLETE

On 8/14/97, the Panel verified that the licensee understood the conditions leading to the shutdown.

b. Potential root causes of the conditions requiring the shutdown and any associated problems were thoroughly evaluated.

STATUS: COMPLETE

Root causes for the problems were identified by the licensee in its evaluation of the service water event and were confirmed by the ISA team's evaluation. The licensee evaluated the conditions requiring shutdown while establishing its restart plan. The Panel concluded that the licensee evaluated root causes during panel meeting on 8/14/97.

# C.1.2 <u>Corrective Action Development</u>

a. The proposed corrective actions are clearly cross-referenced to all of the associated root causes and causal factors they are intended to correct as appropriate.

STATUS: COMPLETE

Although the Restart Plan does not directly reference the root causes identified in the ISA report, the action plans address the root causes. Panel review completed on 11/20/97.

b. Each of the corrective actions is assigned an appropriate priority based on safety significance to ensure the proper resources and attention are devoted.

STATUS: COMPLETE

The licensee presented its criteria for determining those corrective actions that will be addressed prior to restart in a meeting with the Panel on August 28,1997. The actions in the Restart Plan are not assigned a priority as all of the actions are to be completed prior to restart. Actions to be accomplished following restart will be addressed in the 1998 Operational Plan. Panel review completed on 11/20/97.

c. Proposed corrective actions identify the desired conditions to be achieved and are adequate to preclude recurrence.

STATUS: COMPLETE

The action plans identify desired results under the strategy description. Panel

review completed on 11/20/97.

d. Corrective actions are sufficiently detailed to ensure that all activities related to completion of the corrective action have been identified (i.e. procedure or drawing changes, Technical Specification changes, etc.)

STATUS: COMPLETE

At the request of the Panel, the licensee submitted detailed action plans in a letter dated September 16, 1997. Panel review completed on 11/20/97.

e. Corrective actions include restoring systems and equipment to service and verifying they can perform their intended safety functions through post maintenance or post modification testing.

# Restart Plan Cross-Reference

Action Plan 1.1C, Step 4 - Fast Cruise System Checkout
Action Plan 4.2, Step 1.9 - Identify Functional testing requirements including
overall integrated testing and selected ECCS response demonstration testing. This
testing will be directed toward investigation of known problems and confirmation of
problem resolution. This testing will also constitute additional discovery for
problems which cannot be identified via review of past documentation.

STATUS: COMPLETE

Panel review completed 11/20/97. Implementation of the licensee's corrective actions and actual post maintenance and post modification testing will be reviewed during other inspections conducted to address other aspects of the licensee's restart plan.

h. The licensee expanded the scope of the corrective actions to consider all of the causal factor that contributed to the deficiency or problem, including potential generic concerns.

STATUS: COMPLETE

The scope of the Restart Plan addressed the root causes that were identified by the service water system SSOPI, by the ISA, and following the service water event. Panel verified during meeting on 11/20/97.

 Development of the corrective actions included insights from the organizations or individuals that may have contributed to the event, those responsible for developing the corrective actions, and those responsible for implementing the corrective actions.

STATUS: COMPLETE

Inputs for the licensee's action plans included department self-assessments and Action Plan Development Teams. Individual work items were evaluated for

inclusion in the Restart Plan by the line organization. Panel verified during meeting on 11/20/97.

j. Interim corrective actions have been developed and documented when permanent corrective action will take an excessive amount of time to implement or cannot be completed before the licensee plans to restart the facility.

### STATUS: COMPLETE

The licensee's Restart Plan, Revision 1a, dated 8/27/97, addresses the actions to be carried over into Phase II and Phase III (short term and long term actions to be completed following restart) and a discussion of the associated tracking mechanisms. The licensee's plans for restart issue closeout includes documentation for any followup action, which includes a list of actions that will be carried over from Phase I to Phases II or III. Panel review completed on 11/20/97.

k. All corrective actions have been incorporated into a comprehensive corrective action plan, which has been approved by the licensee's independent oversight committee.

### STATUS: COMPLETE

The licensee docketed a restart plan which defines the actions to be taken to address performance deficiencies. Performance standards and measures are established in the licensee's restart plan. The licensee's quality oversight organization completed its review of the restart plan on 4/15/97. The licensee discussed the results of the Quality and Safety Assessment (Q&SA) assessment findings with the NRC during the Restart Panel meeting on 5/29/97.

### C.1.3 Corrective Action Plan Implementation and Effectiveness

a. Each of the corrective actions is assigned a required start and completion date commensurate with the complexity and safety significance of the action.

# STATUS: COMPLETE

The Restart Plan does not include dates although all actions will be completed prior to restart. The licensee presented its proposed restart schedule during a Restart Panel meeting on 11/21/97.

b. An organization and individual have been designated with lead responsibility for each of the corrective actions.

### STATUS: COMPLETE

A sponsor, team leader, and team members are assigned to each of the licensee's action plans. Panel review completed on 11/20/97.

c. The responsible individual has sufficient authority, resources, and management support to ensure that the action will be adequately completed.

# STATUS: COMPLETE

Each corrective action strategy in the licensee's restart plan has a sponsor. The sponsors are upper level management that report either directly to the site vice-president or plant general manager. Panel review completed on 11/20/97.

d. The licensee has defined objectives to be achieved from implementing the corrective action plan, including interim objectives to assess the progress of the plan. The objectives are focused on ensuring a lasting improvement in the operation and maintenance of the plant.

### STATUS: COMPLETE

The licensee has defined objectives for each action plan. Progress is assessed by the performance measures and performance standard provided for each plan. Panel review completed on 11/20/97.

e. Whenever possible, the licensee's objectives are based on a measurable set of criteria that the licensee can readily track and trend, as appropriate, to provide continuous monitoring of the implementation and effectiveness of the corrective action plan. These measures should form the acceptance criteria for closure and provide precursor indication of declining performance.

### STATUS: COMPLETE

Action plans contain performance measures (where applicable) that are being trended by the licensee. Panel review completed on 11/20/97.

f. The licensee has anticipated and addressed potential conflicts of implementing the corrective action plan with existing facility operational (maintenance, engineering, etc.) practices, regulatory requirements, or personnel activities.

# STATUS: COMPLETE

The licensee's plan includes processes for addressing potential conflicts. Panel review completed on 11/20/97.

g. The corrective action plan contains guidance for the licensee to assess changing information or conditions to determine whether the licensee must modify the corrective action plan.

# STATUS: COMPLETE

Additions to or removals from the Restart plan must be presented to the Restart Issue Review Committee for approval. Panel review completed 11/20/97.

h. The licensee has developed training on both the lessons learned from the event analysis and root cause determination and the technical and administrative changes made to the facilities or practices that includes a discussion regarding why the changes are necessary.

STATUS: COMPLETE

The licensee discussed its plan for communicating objectives to plant staff during the Restart Panel meeting on 5/29/97.

i. The corrective action plan includes requirements to have self-assessments, and as necessary, independent assessments, of the implementation and effectiveness of the plan.

STATUS: COMPLETE

The Restart Plan requires that each department perform a self-assessment of its performance. The licensee stated in a letter dated 10/8/97 that the Chief Nuclear Officer will commission an independent assessment of the units readiness for restart after the site vice-president concludes that the plant is ready for restart.

j. In cases where long term actions remain to be accomplished, the licensee has clearly documented when the action will be complete, the basis for the delay in completing the action, and how the action will be tracked and trended to ensure completion.

STATUS: COMPLETE

The licensee's Restart Plan, Revision 1a, dated 8/27/97, addresses the actions to be carried over into Phase II and Phase III (short term and long term actions to be completed following restart) and a discussion of the associated tracking mechanisms. The licensee's plans for restart issue closeout includes documentation for any followup action, which includes a list of actions that will be carried over from Phase I to Phases II or III. Panel review completed on 11/20/97.

k. The licensee has established a predefined time frame following completion of the corrective actions during which they will continue to monitor the effectiveness of the corrective actions.

RESPONSIBILITY: Panel

STATUS: COMPLETE

During the public meeting on 11/21/97, the licensee indicated that the processes described in the licensee's restart plan to address the performance problems which led to the extended shutdown will be implemented on an ongoing basis.

# C.2 <u>LICENSEE SELF-ASSESSMENT AND MANAGEMENT EFFECTIVENESS</u>

# C.2.1 Self-Assessment Capability

a. Effectiveness of Quality Assurance Program.

Restart Plan Cross-Reference

**Action Plan 5.2** - Improve SQV's [Site Quality Verification] ability to diagnose Nuclear Safety and Quality concerns and effectively communicate those issues to line management for resolution prior to external identification or self revealing events.

Action Plan 5.3 - Improve Departmental self-assessments and effectiveness.

### **NRC Verification Plans**

Review plan implementation and effectiveness when performing inspection of the effectiveness of licensee controls in identifying, resolving, and preventing recurring problems (40500 inspection). Tentatively scheduled for March 1998.

RESPONSIBILITY: DRS, Lead Engineers Branch

STATUS: COMPLETE

Partially addressed in IR 98004 and closed in IR 98012.

d. Effectiveness of deficiency reporting system.

# Restart Plan Cross-Reference

**Action Plan 5.1, Step 6** - Issue clear guidance/communication on the Problem Identification Form (PIF) process.

**Action Plan 5.1, Step 12.0** - Implement a formal CARB [Corrective Action Review Board] Procedure.

**Action Plan 5.1, Step 13.2** - Establish indicators for measuring CARB effectiveness.

# **NRC Verification Plans**

Review plan implementation and effectiveness during the 40500 inspection tentatively scheduled for March 1998.

RESPONSIBILITY: DRS, Lead Engineers Branch

STATUS: COMPLETE

Closed in IR 98012.

g. Effectiveness of commitment tracking program.

# Restart Plan Cross-Reference

**Action Plan 5.1, Step 7** - Implement a formal NTS [Nuclear Tracking System] Procedure.

# **NRC** Verification Plans

Review plan implementation and effectiveness during the 40500 inspection

tentatively scheduled for March 1998.

RESPONSIBILITY: DRS, Lead Engineers Branch

STATUS: COMPLETE

Closed in IR 98012.

# C.2.2 <u>Management Oversight and Effectiveness</u>

a. Goals and expectations communicated to and understood by the staff.

# Restart Plan Cross-Reference

**Action Plan 2.1, Step 1** - Expectations - Establish clear expectations for human performance and interaction.

### **NRC Verification Plans**

Review human performance improvement plan implementation during routine resident inspections.

RESPONSIBILITY: DRP

STATUS: COMPLETE

Partially addressed in IR 98004 and closed in IR 98011.

b. Demonstrated expectation of adherence to procedures.

### Restart Plan Cross-Reference

**Action Plan 2.1, Step 2** - Follow-up - Follow-up to ensure expectations are understood and are being applied in daily work activities.

# **NRC** Verification Plans

Review management oversight of procedure adherence during routine resident inspections.

RESPONSIBILITY: DRP

STATUS: COMPLETE

Partially addressed in IR 98009 and closed in IR 98015

c. Management involvement in self-assessment and independent self-assessment capability.

Restart Plan Cross-Reference

Action Plan 4.1, Step 7 - Perform self assessment of above effectiveness.

Action Plan 5.2 - Improve SQV effectiveness.

Action Plan 5.3 - Improve departmental self-assessments and effectiveness.

### **NRC Verification Plans**

Review plan implementation and effectiveness during the 40500 inspection tentatively scheduled for March 1998.

RESPONSIBILITY: DRS, Lead Engineers Branch

STATUS: COMPLETE

Closed in IR 98012.

d. Effectiveness of management review committees.

Restart Plan Cross-Reference

None

NRC Verification Plans

Resident Inspectors will verify adequacy during routine observations.

RESPONSIBILITY: DRP

STATUS: COMPLETE

Closed in IR 98010.

e. Management's demonstrated awareness of day-to-day operational concerns.

# Restart Plan Cross-Reference

**Action Plan 1.2A, Step 16** - Plan of the Day - Weekly discussion of operator work-around impacts.

**Action Plan 1.2B, Step 9** - Implement a monthly review of Temporary Alteration status (Operations, Maintenance, Work Control and Engineering) to establish a mutual agreement on open Temporary Alteration resolution priorities and schedule. Identify and resolve any issues that will prevent achieving performance standards to the Station Manager, including Temporary Alterations older than 1 cycle.

**Action Plan 1.2C**, **Step 6** - Plan of the Day - Daily discussion on Dark Board impacts, open Work Requests, alarms present, etc.

# **NRC Verification Plans**

Resident Inspectors will verify adequacy during routine observations.

RESPONSIBILITY: DRP

STATUS: COMPLETE

Partially addressed in IR 98004 and closed in IR 98010.

f. Management's ability to identify and prioritize significant issues.

## Restart Plan Cross-Reference

**Action Plan 1.2A, Step 13** - Establish objective criteria for emergent and existing OWA [operator work-around] inclusion.

**Action Plan 1.2C, Step 3** - Establish objective criteria for emergent and existing MCR [main control room] WR [work request] inclusion.

Action Plan 3.1, Step 2.5 - Complete documentation reviews prior to restart.

**Action Plan 5.1, Step 8.0** - Implement the new Nuclear Division Corrective Action Nuclear Station Work Procedures (NSWPs).

### NRC Verification Plans

Resident Inspectors will verify adequacy during routine observations.

RESPONSIBILITY: DRP

STATUS: COMPLETE

Closed in IR 98010.

g. Management's ability to coordinate resolution of significant issues.

# Restart Action Plan Cross-Reference

**Action Plan 1.2A, Step 12** - Establish a resolution plan to eliminate OWAs with Safety Significance. Implement a monthly review of open OWAs to establish a mutual agreement on open OWA resolution priorities and schedule. Identify any OWAs that will create an operator distraction at 100% power following unit restart. Unit Plant Manager or Operations Manager must approve any long-term OWAs, including OWAs greater than 1 cycle.

**Action Plan 1.2A, Step 15** - Provide written justification for the OWA that have been deferred to L1R08 or beyond, define the safety impact and the impact on the operators in the plant. Unit Plant Manager an Operations Manager approval is required.

**Action Plan 1.2B, Step 10** - Each TALT [temporary alteration] will have a closure plan that will be evaluated.

**Action Plan 1.2B, Step 11** - Provide written justification for Temp Alts that have been deferred from L1F35, define the safety impact and the impact on the operators in the plant and MCR. Unit Plant Manager and operations approval is required.

**Action Plan 1.2C, Step 5** - Provide written justification for the MCR distractions that have been deferred to L1R08, define the safety impact and the impact on the operators in the MCR. Unit Plant Manager and Operations Manager approval is required.

**Action Plan 5.1, Step 8.0** - Implement the new Nuclear Division Corrective Action NSWP's

# **NRC Verification Plans**

Resident Inspectors will verify adequacy during routine observations.

RESPONSIBILITY: DRP

STATUS: COMPLETE

Partially addressed in IR 98004 and 98010 and closed in IR 98011.

h. Management's ability to implement effective corrective actions.

# Restart Plan Cross-Reference

**Action Plan 1.1A, Step 15** - Establish "baseline" data points for Action Steps #2 through 14. Initiate corrective actions.

**Action Plan 5.1, Step 8** - Implement the new Nuclear Division Corrective Action NSWP's.

# NRC Verification Plans

Review plan implementation and effectiveness during the 40500 inspection tentatively scheduled for March 1998.

RESPONSIBILITY: DRS, Lead Engineers Branch

STATUS: COMPLETE

Partially addressed in IR 98004 and closed in IR 98012.

# C.2.3 <u>Management Support</u>

a. Impact of any management reorganization, with new responsibilities clearly defined and understood.

# **NRC** Verification Plans

Resident Inspectors will review significant reorganizations which may affect plant operations.

STATUS: COMPLETE

Partially addressed in IR 98004 and closed in IR 98012.

c. Adequate engineering support as demonstrated by timely resolution of issues.

# Restart Plan Cross-Reference

Strategy 4 addresses upgrading engineering to support restart and power operation.

# **NRC Verification Plans**

Engineering support will be evaluated during Engineering and Technical Support (E&TS) inspection tentatively scheduled for March 1998.

RESPONSIBILITY: DRS, Lead Engineers Branch

STATUS: COMPLETE

Partially addressed in IR 98005 and Icosed in IR 98015.

d. Adequate plant administrative procedures.

# Restart Plan Cross-Reference

**Action Plan 1.3B, Step 5** - Revise LAP-900-4 to address streamlining procedure, and incorporating the Global OOS process.

# **NRC Verification Plans**

Resident Inspectors will verify completion of Action Plan 1.3B, step 5, and verify adequacy of a sample of administrative procedures during routine observations.

RESPONSIBILITY: DRP

STATUS: COMPLETE

Closed in IR 98009.

# C.3 ASSESSMENT OF PLANT AND CORPORATE STAFF EFFECTIVENESS

# C.3.1 Assessment of Staff

Demonstrated commitment to achieving improved performance.

# Restart Plan Cross-Reference

Strategy 2 addresses human performance to support safe plant operation.

# **NRC Verification Plans**

The Panel will evaluate performance through a review of inspection findings and discussions during routine management meetings with the licensee.

RESPONSIBILITY: Panel

STATUS: COMPLETE

Performance evaluations were routinely accomplised by the Panel and fed into the Plant Performance Review and Senior Management Meeting Processes. The Restart Readiness Inspection provided fine-tuning to that assessment, the results of which were discussed and agreed to during the 7/16/98 and 7/17/98 Panel meetings.

b. Demonstrated safety consciousness.

Restart Plan Cross-Reference

None

# **NRC Verification Plans**

The Panel will evaluate safety consciousness through a review of inspection findings and discussions during routine restart panel meetings with the licensee.

RESPONSIBILITY: Panel

STATUS: COMPLETE

Closed in IR 98011.

c. Understanding of management's expectations and goals.

Restart Plan Cross-Reference

Action Plan 2.1, Step 1 - Human performance and interaction.

NRC Verification Plans

Resident inspectors evaluate plant staff's understanding of management's expectations during routine observations.

RESPONSIBILITY: DRP

STATUS: COMPLETE

Closed in IR 98011.

d. Understanding of plant issues and corrective actions.

Restart Plan Cross-Reference

**Action Plan 2.1, Step 5.4** - Regularly communicate status of the restart plan and system functional reviews.

**NRC Verification Plans** 

Resident inspectors will evaluate the plant staff's understanding of the licensee's

restart plan, emergent plant issues, issues related to the restart plan, and corrective actions during routine observations.

RESPONSIBILITY: DRP

STATUS: COMPLETE

Closed in IR 98011.

k. Procedure usage/adherence.

### Restart Plan Cross-Reference

**Action Plan 2.1, Step 1** - Expectations - Establish clear expectations for human performance and interaction.

**Action Plan 2.1, Step 2** - Follow-up - Follow-up to ensure expectations are understood and being applied in daily work activities.

# **NRC Verification Plans**

Resident inspectors will verify completion of Action Plan 2.1, Step 1 and 2, and evaluate procedure usage and adherence during routine observations.

RESPONSIBILITY: DRP

STATUS: COMPLETE

Partially addressed in IR 98009 and closed in IR 98015.

# C.3.2 Assessment of "Corporate" Support

The panel concluded that an assessment of the corporate support to LaSalle was not necessary for restart since NRC efforts (the ComEd Performance Oversight Panel (CPOP)) are addressing the effectiveness of ComEd corporate support to all ComEd nuclear generating stations.

# C.3.3 Operator Issues

a. Licensed operator staffing meets requirements and licensee goals.

# Restart Plan Cross-Reference

None

# **NRC Verification Plans**

Ensure that operators granted licenses contingent on reactivity manipulations have completed the required manipulations prior to performing licensed duties.

RESPONSIBILITY: DRS, Operator Licensing Branch

STATUS: COMPLETE

Closed in IR 98016.

b. Level of formality in the control room.

### Restart Plan Cross-Reference

**Action Plan 1.1A, Step 7** - Monitor communication for direct, 3-way communication in the Main Control Room and the plant. Document findings, determine causes for inaccurate or incomplete communication and initiate corrective action.

**Action Plan 1.1A, Step 8** - Monitor NSO [Nuclear Station Operator] Alarm Response, prompt response, informed supervisor returns appropriate alarm response procedure.

**Action Plan 1.1A, Step 9** - Monitor pre-shift briefings. Provide immediate feedback to person conducting briefing areas fro improvement. Input to trend database for follow-up.

**Action Plan 1.1A, Step 10** - Monitor pre-job briefs/HLA [heightened level-of-awareness] briefs. Input to trend database for follow-up.

### **NRC Verification Plans**

Restart Readiness Assessment Team will review the licensee's implementation of Action Plan 1.1A steps listed above and verify its completion.

STATUS: COMPLETE

Closed in IR 98015.

c. Effectiveness of control room simulator training.

# Restart Plan Cross-Reference

**Action Plan 6.1, Steps 1.1 - 1.3** - Define Crew needs and wants; Complete reviews of training materials, feedback, observations, etc.; Complete Reviews of Observations, PIFs [problem identification forms], Events, etc.

Action Plan 6.1, Step 3 - Develop the program.

**Action Plan 6.1, Steps 3.2 - 3.3** - Training (Lesson plans, course materials, labs, other operator input); Evaluation/assessment (exams, evaluations, observations, Shift Manager mentors, etc.).

**Action Plan 6.1, Step 4** - Implement the training: -sufficient number of crews trained to support Unit startup.

**Action Plan 6.1, Step 5** - Implement operator evaluations - Operators identified as pass, short or long term remediation.

**Action Plan 6.1, Step 6** - Complete HIT following incorporation of feedback and lessons learned.

**Action Plan 6.1, Step 9** - Complete training identified in action steps 7 & 8 - sufficient number of crews trained to support unit startup.

Action Plan 6.1, Step 10.2 - Evaluate training effectiveness - Review of Exam

Results.

### **NRC Verification Plans**

DRS evaluated HIT program effectiveness. Documented in Inspection Report No. 50-373/97014(DRS); 50-374/97014(DRS).

STATUS: COMPLETE

Partially addressed in IR 97014 and closed in IR 98016.

d. Control room/plant operator awareness of equipment status.

### Restart Plan Cross-Reference

**Action Plan 1.1A, Step 3** - Monitor operator rounds for accuracy and completeness, identification of trends and effectiveness of corrective actions. Document findings, determine causes for inaccurate or incomplete rounds and initiate corrective action.

**Action Plan 1.1A, Step 5** - Monitor out-of-service problems including type and number. Trend results and implement corrective action.

**Action Plan 1.1A, Step 11** - Monitor US/NSO turnover for completeness, board walkdown. Identify deficiencies per"scorecard" debrief with individual. Input to trend database.

**Action Plan 1.1A, Step 12** - Monitor NLO [non-licensed operator] turnovers for completeness, accuracy, professionalism. Identify deficiencies per" scorecard, debrief with individual. Input to trend database.

# **NRC Verification Plans**

Restart Readiness Assessment Team will review selected portions of the licensee's implementation of Action Plan 1.1A.

RESPONSIBILITY: DRS

STATUS: COMPLETE

Closed in IR 98015.

e. Adequacy of plant operating procedures.

# Restart Plan Cross-Reference

**Action Plan 1.3C, Step 1.1 - 1.3** - Additional Scope Discovery - Review surveillances and identify those to be performed prior to start up which need revision from initial review (Unit 1); Review all procedures used to perform a start up and identify those needing revision from initial review (Unit 1); Review all L1F35 DCPs [design change packages] and tabulate required procedure revisions. Unit 1 Only.

Action Plan 1.3C, Step 9 - Complete revision of Startup Procedures identified in

# Step 1.2.

### **NRC Verification Plans**

Restart Readiness Assessment Team will review licensee's plan implementation and effectiveness. The engineering inspector will review implementation of Step 1.3 and verify completion.

RESPONSIBILITY: DRS

STATUS: COMPLETE

Closed in IR 98015.

f. Procedure usage/adherence.

Restart Plan Cross-Reference

**Action Plan 1.1A, Step 2** - Monitor completed surveillances for accuracy and completeness. Document findings, determine causes for inaccurate or incomplete surveillance and initiate corrective action.

Action Plan 1.1A, Step 6 - Monitor procedure use and compliance.

### **NRC Verification Plans**

Restart Readiness Assessment Team will review licensee's plan implementation and effectiveness of Action Plan 1.1A, Step 2 and 6.

RESPONSIBILITY: DRS

STATUS: COMPLETE

Closed in IR 98015.

Log keeping practices.

Restart Plan Cross-Reference

**Action Plan 1.1A, Step 4** - Monitor operator logs for completeness, legibility and conformance with expectations.

**NRC Verification Plans** 

Restart Readiness Assessment Team will review licensee's plan implementation and effectiveness.

RESPONSIBILITY: DRS

STATUS: COMPLETE

Partially addressed in IR 98004 and closed in IR 98015.

# C.3.4 Engineering Support to Operations

a. Engineering personnel qualifications.

## Restart Plan Cross-Reference

Action Plan 4.1, Step 1.0 - Complete system qualifications for all System Engineering personnel for assigned systems. All systems will have System Engineers assigned. This will include both incumbent and contractor personnel. Contractor personnel qualification will be determined on a case-by-case basis considering previous experience and observed capability. Assess personnel capability as required to develop fully capable System Engineering organization. Revise training syllabus to resolve known deficiencies.

**Action Plan 4.1, Step 1.1** - Determine system qualification requirements and methods for achieving; the System Functional Performance Review program and System Readiness Review process will be used as an important part of the qualification process. An oral review board will be used to assist in determining the qualification status of individual System Engineers. This board will be composed of the System Engineer supervisor and selected Group Leaders.

**Action Plan 4.1, Step 1.4** - Perform self-assessment of effectiveness of qualification process.

**Action Plan 4.1, Step 3** - Use System Functional Performance Review program and Engineering Assurance Group reviews as part of the fundamental tutoring processes for assessing and improving the technical capabilities of Engineering.

# **NRC Verification Plans**

E&TS Inspection tentatively scheduled for March 1998, will review the implementation.

RESPONSIBILITY: DRS

STATUS: COMPLETE

Closed in IR 98005.

b. Engineering Assurance Group

# Restart Plan Cross-Reference

**Action Plan 4.1, Step 2.0** - Fully implement Engineering Assurance Group functions. Reviews by Engineering Assurance will be in-line for the following engineering products: Safety Evaluations, Operability Evaluations, Technical Specifications Clarifications, Root Cause Reports, selected design packages, selected material evaluations, LERs, regulatory submittals.

### NRC Verification Plans

Engineering inspector will review the implementation and effectiveness of the licensee's plans during routine inspections and E&TS inspection tentatively scheduled for March 1998.

Planned completion moved from E&TS inspection to SAQV inspection on 4/9/98 per E. Duncan.

RESPONSIBILITY: DRS

STATUS: COMPLETE

Closed in IR 98012.

# C.4 ASSESSMENT OF PHYSICAL READINESS OF THE PLANT

a. Operability of technical specification systems.

# Restart Plan Cross-Reference

**Action Plan 1.1C, Step 3.1 - 3.3** - Complete Pre-start up reviews - Complete LAP-1200-15, as required to support mode switch to startup; Complete Start up OSR; Complete Start up PORC.

**Action Plan 4.2, Step 2** - Design Reviews - As the complement to the System Functional Performance Reviews, certain systems or portions of systems will require a detailed design review to identify and resolve problems. Four systems have been identified to date for this review (VE/VC, CSCS, 125 VDC).

**Action Plan 4.2, Step 5** - Vendor Information and Operating Experience Reviews. **Action Plan 4.2, Step 5.1** - Review selected vendor information and operating experience files to establish the adequacy of review process in consideration of repeated failure to identify potential design problems with SBM control switches. Determine scope of Operating historical vendor information and industry experience that should be reviewed to determine confidence in past practices.

**Action Plan 4.2, Step 9.2** -System Readiness Review - For all systems important to safe and reliable operation, perform system readiness review; present results to Senior Management Review. Compete Unit 1 reviews.

# **NRC Verification Plans**

Restart Readiness Assessment Team will evaluate a sample of licensee reviews to verify acceptability.

RESPONSIBILITY: DRS

STATUS: COMPLETE

Closed in IR 98015.

b. Operability of required secondary and support systems.

Restart Plan Cross-Reference

**Action Plan 1.2A, Step 11** - Schedule or complete an action plan for each Operator Work-Around (OWA) that is listed on the L1F35 OWA list defining the resolution plan, schedule date and responsible individual/organization. Update on an ongoing basis.

**Action Plan 4.2, Step 2** - Design Reviews - As the complement to the System Functional Performance Reviews, certain systems or portions of systems will require a detailed design review to identify and resolve problems. Four systems have been identified to date for this review (VE/VC, CSCS, 125 VDC).

**Action Plan 4.2, Step 9.2** - System Readiness Review - For all systems important to safe and reliable operation, perform system readiness review; present results to Senior Management Review. Complete Unit 1 reviews.

# NRC Verification Plans

Restart Readiness Assessment Team will evaluate a sample of licensee reviews to verify acceptability.

RESPONSIBILITY: DRS

STATUS: COMPLETE

Closed in IR 98015.

c. Results of pre-startup testing.

# Restart Plan Cross-Reference

Action Plan 1.1C, Step 4 - Fast Cruise system checkout.

**Action Plan 4.2, Step 1.1** - System Functional Performance Reviews and Functional Testing.

**Action Plan 4.2, Step 1.2** - Proceed with System Functional Performance Reviews on all systems selected as important to safe and reliable operation; complete functional reviews on a minimum of 15 to 20 of these systems prior to restart. Apply evaluation criteria to ongoing results of review to determine possible expansion to full scope of functional review prior to restart.

Action Plan 4.2, Step 1.6 - Formalize review organization.

**Action Plan 4.2, Step 1.7** - Formalize review, problem reporting and resolution process, reporting requirements, and closure process.

**Action Plan 4.2, Step 1.8** - Complete review portion for 42 systems in System Functional Performance Reviews including recommended functional testing requirements.

**Action Plan 4.2, Step 1.9** - Identify functional testing requirements including overall integrated testing and selected ECCS response demonstration testing. This testing will be directed toward investigation of known problems and confirmation of problem resolution. This testing will also constitute additional discovery for problems which cannot be identified via review of past documentation.

**Action Plan 4.2, Step 1.10** - Implement Joint Test Group process to facilitate test procedure preparation, review, implementation and results.

**Action Plan 4.2, Step 1.11** - Review startup related procedures for adequacy and literal compliance capability.

# **NRC** Verification Plans

Observe testing activities during routine inspection activities.

RESPONSIBILITY: DRP and DRS

STATUS: COMPLETE

Closed in IR 98011.

d. Adequacy of system lineups.

Restart Plan Cross-Reference

Action Plan 1.1C, Step 2 - Plant equipment lineup verification.

NRC Verification Plans

Restart Readiness Assessment Team will review the licensee's plan implementation and its effectiveness.

RESPONSIBILITY: DRS

STATUS: COMPLETE

Closed in IR 98015.

e. Adequacy of surveillance tests/test program.

Restart Plan Cross-Reference

**Action Plan 1.3C**, **Steps 1.1 - 1.3** and step 9 - Review and revise operating procedures.

**Action Plan 4.2, Step 1.9** - Identify Functional testing requirements including overall integrated testing and selected ECCS response demonstration testing. This testing will be directed toward investigation of known problems and confirmation of problem resolution. This testing will also constitute additional discovery for problems which cannot be identified via review of past documentation.

**Action Plan 4.2, Step 2** - Design Reviews - As the complement to the System Functional Performance Reviews, certain systems or portions of systems will require a detailed design review to identify and resolve problems. Four systems have been identified to date for this review (VE/VC, CSCS, 125 VDC).

Action Plan 3.1, Steps 2.3.1, 2.3.1.1, and 2.3.1.2 - Validate required surveillance/PM scope.

# **NRC Verification Plans**

Restart Readiness Assessment Team and E&TS inspection will evaluate a sample of licensee reviews to verify acceptability.

RESPONSIBILITY: DRS

STATUS: COMPLETE

Partially addressed in IR 98005 and closed in IR 98015.

f. Significant hardware issues resolved (i.e., damaged equipment, equipment ageing, modifications).

# Restart Plan Cross-Reference

Action Plan 1.1C, Step 4 - Fast Cruise System Checkout

**Action Plan 3.1, Steps 2.1 - 2.3 - Identify and approve final work necessary for unit restart.** 

**Action Plan 3.1, Step 2.4.1** - Document discovery results on system basis.

**Action Plan 3.1, Step 2.4.2** - Perform Confirmatory system Readiness review for all systems in original scope (Step 2.3 above).

**Action Plan 3.1, Step 2.4.3** - Present a consolidated status of Unit One System Readiness to Management prior to restart.

**Action Plan 4.2, Step 1.9** - Identify functional testing requirements including overall integrated testing and selected ECCS response demonstration testing. This testing will be directed toward investigation of known problems and confirmation of problem resolution. This testing will also constitute additional discovery for problems which cannot be identified via review of past documentation.

**Action Plan 4.2, Step 2** - Design Reviews - As the complement to the System Functional Performance Reviews, certain systems or portions of systems will require a detailed design review to identify and resolve problems. Four systems have been identified to date for this review (VE/VC, CSCS, 125 VDC).

**Action Plan 4.2, Step 9.2** - System Readiness Review - For all systems important to safe and reliable operation, perform system readiness review; present results to Senior Management Review. Complete Unit 1 reviews

# **NRC Verification Plans**

Restart Readiness Assessment Team and Residents Inspectors will verify that significant hardware issues have been resolved and review implementation and effectiveness of above action plan steps.

RESPONSIBILITY: DRP and DRS

STATUS: COMPLETE

Closed in IR 98015.

g. Adequacy of the power ascension testing program.

### Restart Plan Cross-Reference

Action Plan 1.1C, Step 4 - Fast Cruise system checkout.

# **NRC Verification Plans**

Restart Readiness Assessment Team will evaluate adequacy of licensee's restart and power ascension plan.

RESPONSIBILITY: DRS

STATUS: COMPLETE

Closed in IR 98015.

h. Effectiveness of the plant maintenance program including scheduling and work control.

# Restart Plan Cross-Reference

Action Plan 7.1, Step 8.1 - Implement NSWP A-04.

# **NRC** Verification Plans

Resident staff will evaluate effectiveness of the work control and scheduling processes during routine observations.

RESPONSIBILITY: DRP

STATUS: COMPLETE

Addressed in IR 98004 and closed in IR 98010.

i. Maintenance backlog managed and impact on operations assessed.

# Restart Plan Cross-Reference

**Action Plan 3.3, Steps 2.1 and 2.2** - Determine which Corrective Tasks must be completed prior to Startup - Unit 1.

**Action Plan 3.3, Step 5.1** - Audit completion of Corrective NWR [Nuclear Work Request] Tasks prior to unit startup - Unit 1.

# **NRC Verification Plans**

The Resident Inspectors will evaluate the impact of the maintenance backlog and its impact on operations.

RESPONSIBILITY: DRP

STATUS: COMPLETE

Closed in IR 98010.

k. Engineering backlog managed and impact on operations assessed.

## Restart Plan Cross-Reference

Action Plan 4.2, Steps 8 - 8.6.1 - Backlog Review - Review all backlog items and assess importance for resolution prior to restart (e.g., ERs, PIFs/root cause determinations/corrective actions, Operator Work-Arounds, Control Room Deficiencies, outstanding ARs and Work Requests) against all systems considered important to safe and reliable operation. Use "Restart Review Criteria."

#### **NRC Verification Plans**

Review programs during E&TS inspection tentatively scheduled for March 1998.

RESPONSIBILITY: DRS

STATUS: COMPLETE

Partially addressed in IR 98004 and closed in IR 98005.

I. Technical issues which would preclude restart (Restart Issues) are managed by the licensee.

Restart Plan Cross-Reference

None

## **NRC Verification Plans**

Review the licensee's list of restart issues and discuss the status during restart meetings.

Inspect the licensee's action during reviews for C.4.a, C.4.b, and C.4.f. Restart Readiness Assessment Team will evaluate a sample of licensee reviews to verify acceptability.

RESPONSIBILITY: DRP and DRS

STATUS: COMPLETE

Closed in IR 98015.

# C.5 ASSESSMENT OF COMPLIANCE WITH REGULATORY REQUIREMENTS

a. Applicable license amendments have been issued.

RESPONSIBILITY: NRR

STATUS: COMPLETE

Verified amendments issued. These were discussed and the item closed in the 7/16/98 Panel meeting.

b. Applicable exemptions have been granted.

RESPONSIBILITY: NRR

STATUS: COMPLETE

No exemptions were required for restart. This was discussed and the item closed in the 7/16/98 Panel meeting.

c. Applicable reliefs have been granted.

RESPONSIBILITY: NRR

STATUS: COMPLETE

Verified reliefs granted. These were discussed and the item closed in the 7/16/98 Panel meeting.

e. Confirmatory Action Letter conditions have been satisfied.

RESPONSIBILITY: Panel

STATUS: COMPLETE

Discussed and verified CAL items were complete during 7/23/98 Panel meeting.

f. Significant enforcement issues have been resolved.

STATUS: COMPLETE

Enforcement discretion in accordance with Sections VII.B.2 and VII.B.6 of the Enforcement Policy was authorized for several violations related to actions prior to the shutdown. These were discussed with the Panel on 7/16/98 which verified no additional pending escalated enforcement issues. E-mail was also sent to inspectors involved with LaSalle over the past year to ensure there were no additional startup issues which had not been identified as such.

g. Allegations have been appropriately addressed.

**NRC Verification Plans** 

The Panel will be briefed by Region III Office Allegation Coordinator prior to restart.

RESPONSIBILITY: PANEL

STATUS: COMPLETE

The Panel reviewed the open allegations on 7/16/98 and determined none to be startup issues.

## C.6 COORDINATION WITH INTERESTED AGENCIES AND PARTIES

Coordination with other interested agencies and parties is important to ensure that concerns and requirements of these organizations are factored into the restart authorization.

a. Federal Emergency Management Agency.

RESPONSIBILITY: NRR

STATUS: COMPLETE

Regional Liason Officer verified with FEMA that FEMA did not have any restart concerns regarding LaSalle. This item was discussed and verified closed during 7/23/98 Panel meeting.

e. Appropriate State and local officials.

STATUS: COMPLETE

Periodic management meetings open to the public were conducted during the extended shutdown. The Regional Liason Officer notified the Illinois Department of Nuclear Safety and the Illinois Commerce Commission regarding the LaSalle Restart public meeting. No comments or concerns were presented to the NRC staff. In addition, a press release was issued with regard to the meeting. This item is considered closed based upon discussion of current status, specific description of actions being taken to complete this item, and Panel agreement to those steps during the 7/23/98 Panel meeting. Another press release is planned once the MC 0350 and CAL closeout letter is signed out. Final verification is being tracked outside the MC 0350 Plan.

f. Appropriate public interest groups.

STATUS: COMPLETE

Periodic management meetings open to the public were conducted during the extended shutdown. In addition, a press release was issued with regard to the Restart public meeting. No comments or concerns were presented to the NRC staff. This item is considered closed based upon discussion of current status, specific description of actions being taken to complete this item, and Panel agreement to those steps during the 7/23/98 Panel meeting. Another press release is planned once the MC 0350 and CAL closeout letter is signed out. Final verification is being tracked outside the MC 0350 Plan.

g. Local news media.

RESPONSIBILITY: Regional Public Affairs staff

STATUS: COMPLETE

Periodic management meetings open to the public were conducted during the

extended shutdown. In addition, a press release was issued with regard to the Restart public meeting. No comments or concerns were presented to the NRC staff. In addition, issues raised in the Union of Concerned Scientists press release was discussed during the 7/23/98 Panel meeting. This item is considered closed based upon discussion of current status, specific description of actions being taken to complete this item, and Panel agreement to those steps during the 7/23/98 Panel meeting. Another press release is planned once the MC 0350 and CAL closeout letter is signed out. Final verification is being tracked outside the MC 0350 Plan.

# C.7 ADDITIONAL PLANT SPECIFIC ISSUES AND INSPECTION ITEMS

a. Review Inservice Testing (IST) program based on number of significant deficiencies identified.

#### Restart Plan Cross-Reference

**Action Plan 4.2, Step 3.8** - Review Completed IST assessment to determine items needing correction prior to startup.

#### **NRC Verification Plans**

Conduct IST program inspection prior to restart.

RESPONSIBILITY: DRS

STATUS: COMPLETE

Closed in IR 98005.

b. Review setpoint and calibration control programs.

#### Restart Plan Cross-Reference

**Action Plan 4.2, Step 6** - Design Evaluations - Examine outstanding design evaluations and analysis work and determine which work required to be completed before restart (e.g., setpoint calculations).

#### **NRC Verification Plans**

Review programs during E&TS inspection tentatively scheduled for March 1998.

RESPONSIBILITY: DRS

STATUS: COMPLETE

Closed in IR 98005.

## LASALLE RESTART PLAN: CASE-SPECIFIC CHECKLIST MATRIX

#### C.1 ASSESSMENT OF ROOT CAUSE IDENTIFICATION AND CORRECTION

ITEM NUMBER	DESCRIPTION	RESTART PLAN REFERENCES	LICENSEE ACTION STATUS	RESPONSIBLE ORGANIZATION	DATE CLOSED/ MECHANISM
1.	Event analysis and Root Cause Assessment				
a.	Conditions leading up to and eventually requiring the shutdown, including performance and process concerns related to the shutdown, are understood.	Plan dated 8/27/97	Complete	Panel	COMPLETE; 8/14/97 RESTART MEETING
b.	Potential root causes of the conditions requiring the shutdown and any associated problems were thoroughly evaluated.	Plan dated 8/27/97	Complete	Panel	COMPLETE; 8/14/97 RESTART MEETING
2.	Corrective Action Development				
a.	The proposed corrective actions are clearly cross-referenced to all of the associated root causes and causal factors they are intended to correct as appropriate.	Various	Complete	Panel	COMPLETE; Panel meeting 11/20/97
b.	Each of the corrective actions is assigned an appropriate priority based on safety significance to ensure the proper resources and attention are devoted.	Various	Complete	Panel	COMPLETE; Panel meeting 11/20/97
C.	Proposed corrective actions identify the desired conditions to be achieved and are adequate to preclude recurrence.	Various	Complete	Panel	COMPLETE; Panel meeting 11/20/97
d.	Corrective actions are sufficiently detailed to ensure that all activities related to completion of the corrective action have been identified (i.e. procedure or drawing changes, Technical Specification changes, etc.).	Various	Complete	Panel	COMPLETE; Panel meeting 11/20/97
e.	Corrective actions include restoring systems and equipment to service and verifying they can perform their intended safety functions through post maintenance or post modification testing.	1.1C, step 4 4.2, step 1.9	Complete	Panel	COMPLETE; Panel meeting 11/20/97
h.	The licensee expanded the scope of the corrective actions to consider all of the causal factor that contributed to the deficiency or problem, including potential generic concerns.	Various	Complete	Panel	COMPLETE; Panel meeting 11/20/97
i.	Development of the corrective actions included insights from the organizations or individuals that may have contributed to the event, those responsible for developing the corrective actions, and those responsible for implementing the corrective actions.	Various	Complete	Panel	COMPLETE; Panel meeting 11/20/97
j.	Interim corrective actions have been developed and documented when permanent corrective action will take an excessive amount of time to implement or cannot be completed before the licensee plans to restart the facility	Various	Complete	Panel	COMPLETE Panel meeting 11/20/97

ITEM NUMBER	DESCRIPTION	RESTART PLAN REFERENCES	LICENSEE ACTION STATUS	RESPONSIBLE ORGANIZATION	DATE CLOSED/ MECHANISM
k.	All corrective actions have been incorporated into a comprehensive corrective action plan, which has been approved by the licensee's independent oversight committee.	Various	Complete	Panel	COMPLETE; Restart Panel Meeting 11/21/97
3.	Corrective Action Plan Implementation and Effectiveness				
a.	Each of the corrective actions is assigned a required start and completion date commensurate with the complexity and safety significance of the action.	Various	Complete	Panel	COMPLETE; Panel ew 11/20/97
b.	An organization and individual have been designated with lead responsibility for each of the corrective actions.	Various	Complete	Panel	COMPLETE; Panel review 11/20/97
C.	The responsible individual has sufficient authority, resources, and management support to ensure that the action will be adequately completed.	Various	Complete	Panel	COMPLETE; Panel meeting 11/20/97
d.	The licensee has defined objectives to be achieved from implementing the corrective action plan, including interim objectives to assess the progress of the plan. The objectives are focused on ensuring a lasting improvement in the operation and maintenance of the plant.	Various	Complete	Panel	COMPLETE; Panel meeting 11/20/97
e.	Whenever possible, the licensee's objectives are based on a measurable set of criteria that the licensee can readily track and trend, as appropriate, to provide continuous monitoring of the implementation and effectiveness of the corrective action plan.  These measures should form the acceptance criteria for closure and provide precursor indication of declining performance.	Various	Complete	Panel	COMPLETE; Panel meeting 11/20/97
f.	The licensee has anticipated and addressed potential conflicts of implementing the corrective action plan with existing facility operational (maintenance, engineering, etc.) practices, regulatory requirements, or personnel activities.	Various	Complete	Panel	COMPLETE; Panel meeting 11/20/97
g.	The corrective action plan contains guidance for the licensee to assess changing information or conditions to determine whether the licensee must modify the corrective action plan.	Various	Complete	Panel	COMPLETE; Panel meeting 11/20/97
h.	The licensee has developed training on both the lessons learned from the event analysis and root cause determination and the technical and administrative changes made to the facilities or practices that includes a discussion regarding why the changes are necessary.	Various	Complete	Panel	COMPLETE; Restart Panel Meeting 5/29/97
i.	The corrective action plan includes requirements to have self- assessments, and as necessary, independent assessments, of the implementation and effectiveness of the plan.	Licensee letter dated 10/8/97	Complete	Panel	COMPLETE; Licensee letter dated 10/8/97

j.	In cases where long term actions remain to be accomplished, the	Various	Complete	Panel	COMPLETE;
	licensee has clearly documented when the action will be complete,				Panel meeting
	the basis for the delay in completing the action, and how the action				11/20/97
	will be tracked and trended to ensure completion				

ITEM NUMBER	DESCRIPTION	RESTART PLAN REFERENCES	LICENSEE ACTION STATUS	RESPONSIBLE ORGANIZATION	DATE CLOSED/ MECHANISM
k.	The licensee has established a predefined time frame following completion of the corrective actions during which they will continue to monitor the effectiveness of the corrective actions.	None	Complete	panel	COMPLETE; Restart Panel Meeting 11/21/97

## C.2 ASSESSMENT OF LICENSEE MANAGEMENT EFFECTIVENESS

ITEM NUMBER	DESCRIPTION	RESTART PLAN REFERENCES	LICENSEE ACTION STATUS	RESPONSIBLE ORGANIZATION	DATE CLOSED/ MECHANISM
1.	Self-Assessment Capability				
a.	Effectiveness of Quality Assurance Program.	Action Plan 5.2 Action Plan 5.3	Closed	DRS SAQV-6	98004-P 98012-C
d.	Effectiveness of deficiency reporting system.	Action Plan 5.1, steps 6, 12, and 13.2	Closed	DRS SAQV-6	98012-C
g.	Effectiveness of commitment tracking program.	Action Plan 5.1, step 7	Closed	DRS SAQV-6	98012-C
2.	Management Oversight and Effectiveness				
a.	Goals and expectations communicated to and understood by the staff.	Action Plan 2.1, step 1	Closed	DRP RESIDENT-2	98004-P 98011-C
b.	Demonstrated expectation of adherence to procedures.	Action Plan 2.1, step 2	Closed	DRP RESIDENT-3	98009-P 98015-C
C.	Management involvement in self-assessment and independent self-assessment capability.	Action Plan 4.1, step 7 Action Plan 5.2 Action Plan 5.3	Closed	DRS SAQV-6	98012-C
d.	Effectiveness of management review committees.	None	N/A	DRP RESIDENT-2	98010-C
e.	Management's demonstrated awareness of day-to-day operational concerns.	Action Plan 1.2A, step 16 Action Plan 1.2B, step 9 Action Plan 1.2C, step 6	Closed	DRP RESIDENT-3	98004-P 98010-C
f.	Management's ability to identify and prioritize significant issues.	Action Plan 1.2A, step 13 Action Plan 1.2C, step 3 Action Plan 3.1, step 2.5 Action Plan 5.1, step 8	Closed	DRP RESIDENT-2	98010-C

ITEM NUMBER	DESCRIPTION	RESTART PLAN REFERENCES	LICENSEE ACTION STATUS	RESPONSIBLE ORGANIZATION	DATE CLOSED/ MECHANISM
g.	Management's ability to coordinate resolution of specific issues.	Action Plan 1.2A, steps 12 and 15 Action Plan 1.2B, steps 10 and 11 Action Plan 1.2C, step 5 Action Plan 5.1, step 8	Closed	DRP RESIDENT-2	98004-P 98010-P 98011-C
h.	Management's ability to implement effective corrective actions.	Action Plan 1.1A, step 15 Action Plan 5.1, Step 8	Closed	DRS SAQV-6	98004-P 98012-C
3.	Management Support				
a.	Impact of any management reorganization, with new responsibilities clearly defined and understood.	None	N/A	DRP RESIDENT-4	98009-C
C.	Adequate engineering support as demonstrated by timely resolution of issues.	Strategy 4	Closed	DRS E&TS-5	98005-P 98015-C
d.	Adequate plant administrative procedures.	Action Plan 1.3B, step 5	Closed	DRP RESIDENT-3	98009-C

## C.3 ASSESSMENT OF PLANT AND CORPORATE STAFF EFFECTIVENESS

ITEM NUMBER	DESCRIPTION	RESTART PLAN REFERENCES	LICENSEE ACTION STATUS	RESPONSIBLE ORGANIZATION	DATE CLOSED/ MECHANISM
1.	Assessment of Staff				
a.	Demonstrated commitment to achieving improved performance.	Strategy 2	Closed	Panel	Discussed and verified closed in 7/16/98 & 7/17/98 Panel meetings
b.	Demonstrated safety consciousness.	None	N/A	Panel	98011-C
C.	Understanding of management's expectations and goals.	Action Plan 2.1	Closed	DRP RESIDENT-2	98011-C
d.	Understanding of plant issues and corrective actions.	Action Plan 2.1, step 5.4	Closed	DRP RESIDENT-2	98011-C
k.	Procedure usage/adherence.	Action Plan 2.1, step 1 Action Plan 2.1, step 2	Closed	DRP RESIDENT-3	98009-P 98015-C
2.	Assessment of "Corporate" Support	N/A	N/A	N/A	N/A
3.	Operator Issues				
a.	Licensed operator staffing meets requirements and licensee goals.	None	Closed	DRS/Requal observations	98016-C
b.	Level of formality in the control room.	Action Plan 1.1A, steps 7, 8, 9, and 10	Closed	DRS RRAT-12	98015-C
C.	Effectiveness of control room simulator training.	Action Plan 6.1, steps 1.1 - 1.3, 3, 3.2 - 3.3, 4, 5, 6, 9, and 10.2	Closed	DRS	97014-P 98016-C
d.	Control room/plant operator awareness of equipment status.	Action Plan 1.1A, steps 3, 5, 11, and 12	Closed	DRS RRAT-12	98015-C
e.	Adequacy of plant operating procedures.	Action Plan 1.3C, step 1.1 - 1.3 and 9	Closed	DRS RRAT-12	98015-C
f.	Procedure usage/adherence.	Action Plan 1.1A, steps 2 and 6	Closed	DRS RRAT-12	98015-C
g.	Log keeping practices.	Action Plan 1.1A, step 4	Closed	DRS RRAT-12	98004-P 98015-C
4.	Engineering Support to Operations				

a.	Engineering personnel qualifications.	Action Plan 4.1, steps 1, 1.1, 1.4, and 3	Closed	DRS E&TS-5	98005-C
b.	Engineering Assurance Group.	Action Plan 4.1, step 2	Closed	DRS SAQV-6	98012-C

#### C.4 ASSESSMENT OF PHYSICAL READINESS OF THE PLANT

ITEM NUMBER	DESCRIPTION	RESTART PLAN REFERENCES	LICENSEE ACTION STATUS	RESPONSIBLE ORGANIZATION	DATE CLOSED/ MECHANISM
a.	Operability of technical specification systems.	Action Plan 1.1C, step 3.1 - 3.3 Action Plan 4.2, steps 2, 5, 5.1, and 9.2	Closed	DRS RRAT-12	98015-C
b.	Operability of required secondary and support systems.	Action Plan 1.2A, step11 Action Plan 4.2, steps 2 and 9.2	Closed	DRS RRAT-12	98015-C
C.	Results of pre-startup testing.	Action Plan 1.1C, step 4 Action Plan 4.2, steps 1.1, 1.2, and 1.6 - 1.11	Closed	DRP and DRS RESIDENT-4	98011-C
d.	Adequacy of system lineups.	Action Plan 1.1C, step 2	Closed	DRS RRAT-12	98015-C
e.	Adequacy of surveillance tests/test program.	Action Plan 1.3C, steps 1.1 - 1.3 Action Plan 4.2, steps 1.9 and 2 Action Plan 3.1, steps 2.3.1, 2.3.1.1, and 2.3.1.2	Closed	DRS E&TS-5 RRAT-12	98005-P 98015-C
f.	Significant hardware issues resolved (i.e., damaged equipment, equipment ageing, modifications).	Action Plan 1.1C, step 4 Action Plan 3.1, steps 2.1 - 2.3, 2.4.1, 2.4.2, and 2.4.3 Action Plan 4.2, steps 1.9, 2, and 9.2	Closed	DRS RRAT-12	98015-C
g.	Adequacy of the power ascension testing program.	Action Plan 1.1C step 4	Closed	DRS RRAT-12	98015-C
h.	Effectiveness of the plant maintenance program including scheduling	Action Plan 7.1,	Closed	DRP RESIDENT-3	98004-P 98010-C

ITEM NUMBER	DESCRIPTION	RESTART PLAN REFERENCES	LICENSEE ACTION STATUS	RESPONSIBLE ORGANIZATION	DATE CLOSED/ MECHANISM
i.	Maintenance backlog managed and impact on operations assessed.	Action Plan 3.3, steps 2.1 and 2.2 Action Plan 3.3, step 5.1	Closed	DRP RESIDENT-4	98010-C
k.	Engineering backlog managed and impact on operations assessed.	Action Plan 4.2, steps 8 - 8 6 1	Closed	DRS F&TS-5	98004-P 98005-C
ITEM NUMBER	DESCRIPTION	RESTART PLAN REFERENCES	LICENSEE ACTION STATUS	RESPONSIBLE ORGANIZATION	DATE CLOSED/ MECHANISM
l.	Technical issues which would preclude restart (Restart Issues) are managed by the licensee	None	N/A	DRS and DRP RRAT-12 RESIDENT-4	98015-C

## C.5 ASSESSMENT OF COMPLIANCE WITH REGULATORY REQUIREMENTS

ITEM NUMBER	DESCRIPTION	RESTART PLAN REFERENCES	LICENSEE ACTION STATUS	RESPONSIBLE ORGANIZATION	DATE CLOSED/ MECHANISM
а.	Applicable license amendments have been issued.		Closed	NRR	Discussed and closed in 7/16/98 Panel meeting.
b.	Applicable exemptions have been granted.		Closed	NRR	Discussed and closed in 7/16/98 Panel meeting.
c.	Applicable reliefs have been granted.		Closed	NRR	Discussed and closed in 7/16/98 Panel meeting.
e.	Confirmatory Action Letter conditions have been satisfied.		Open	Panel	Verified and closed in 7/23/98 Panel meeting.
f.	Significant enforcement issues have been resolved.		N/A	Various	Discussed and closed in 7/16/98 Panel meeting.
g.	Allegations have been appropriately addressed.		N/A	Panel	Discussed and closed in 7/16/98 Panel meeting.

## C.6 COORDINATION WITH INTERESTED AGENCIES AND PARTIES

ITEM NUMBER	DESCRIPTION	RESTART PLAN REFERENCES	LICENSEE ACTION STATUS	RESPONSIBLE ORGANIZATION	DATE CLOSED/ MECHANISM
a.	Federal Emergency Management Agency.	N/A	N/A	NRR	Specific actions discussed & closed in 7/23/98 Panel meeting.
е.	Appropriate state and local officials.	N/A	N/A	Panel	Specific actions discussed & closed in 7/23/98 Panel meeting.
f.	Appropriate public interest groups.	N/A	N/A	Panel	Specific actions discussed & closed in 7/23/98 Panel meeting.
g.	Local news media.	N/A	N/A	Region III Public Affairs Staff	Specific actions discussed & closed in 7/23/98 Panel meeting.

## C.7 ADDITIONAL PLANT SPECIFIC ISSUES AND INSPECTIONS ITEMS

ITEM NUMBER	DESCRIPTION	RESTART PLAN REFERENCES	LICENSEE ACTION STATUS	RESPONSIBLE ORGANIZATION	DATE CLOSED/ MECHANIS M
a.	Review Inservice Testing (IST) program based on number of significant deficiencies identified.	Action Plan 4.2, step 3.8	Closed	DRS IST-8	98005-C
b.	Review setpoint and calibration control programs.	Action Plan 4.2, step 6	Closed	DRS E&TS-5	98005-C